

**REMARKS / ARGUMENTS**

After the foregoing amendment, claims 1 - 13 are pending in the application. Claim 8 has been amended to correct a minor typographical error. Applicants submit that no new matter has been added to the application by the amendment.

Applicant respectfully requests additional consideration and review of the claims in view of the following remarks.

**Rejections Under 35 U.S.C. § 102(e)**

The Examiner has rejected claim 1 under 35 U.S.C. § 102(e) as being anticipated by Hwang et al, US Pub. No. 2001/0038477 (Hwang). Applicant respectfully traverses the rejections.

Careful review of the Hwang reference reveals that Hwang discloses a wavelength managing module for bidirectional wavelength multiplexing and path management.

Although the present invention as claimed in claim 1 is directed to an apparatus for use in a bidirectional wavelength division multiplexed transmission system, the claimed apparatus does not merely provide multiplexing and path management. Specifically, as discussed in the specification as filed, the present invention provides a novel approach to the isolation need of counterpropagating reflected energy in such bidirectional WDM systems. See page 2 line 20 - page 3 line 21.

More particularly, the gain block of claim 1, as amended, includes interleaver means *positioned to block counterdirectional crosstalk, codirectional crosstalk and roundtrip gain*. Those skilled in the art can readily appreciate the benefit provided by the interleaver means of protecting the amplifiers from counterdirectional crosstalk, codirectional crosstalk and roundtrip gain impairments produced by either discrete reflections, Rayleigh backscatter, or a

combination thereof. Hwang nowhere discloses, teaches or even suggests such interleaver means.

In view of the foregoing, Applicants submit that Hwang does not anticipate claim 1, and respectfully request withdrawal of the rejections under 35 U.S.C. § 102(e).

#### Rejections Under 35 U.S.C. § 103

Claims 1-12 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over the admitted prior art of FIG 2 in view of Lee et al (US Pub. No. 2002/0018286)(Lee). Applicants respectfully traverse the rejection.

Applicants have amended claims 1, 6 and 8-12 to claim apparatus wherein the interleaver (means) is positioned to block counterdirectional crosstalk, codirectional crosstalk and roundtrip gain.

As similarly discussed above with regard to Hwang, Applicants submit that Lee nowhere teaches or suggests such an interleaver means for protecting the amplifiers from counterdirectional crosstalk, codirectional crosstalk and roundtrip gain impairments produced by either discrete reflections, Rayleigh backscatter, or a combination thereof.

Accordingly, Applicants submit that the disclosure of Lee and FIG.2 do not render obvious claims 1 - 12, and therefore respectfully requests that the rejection under 35 U.S.C. § 103(a) be withdrawn.

#### Conclusion

In so far as the Examiner's objections and rejections have been fully addressed, the instant application, including claims 1 - 13, is in condition for allowance. A Notice of Allowability is therefore earnestly solicited.

If there are any outstanding issues that the Examiner feels may be resolved by way of a telephone conference, the Examiner is cordially invited to contact the undersigned to resolve these issues.

Respectfully submitted,

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